

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

(For permits requiring public notice)

Title V draft permit No. V-99-063

PUBLISHERS PRINTING COMPANY

SHEPHERDSVILLE, KY.

June 2, 2000

MARGARET MORRISON, REVIEWER

Plant I.D. # 104-0440-0019

Application Log # F439

SOURCE DESCRIPTION:

Publishers Printing Company is an offset lithographic paper printing plant which prints magazines. Printing takes place on ten offset lithographic presses each with a natural gas fired dryer. All of the presses are control by condenser/filters. Insignificant activities consist of a waste paper cyclone which exhaust inside the building, small hot melt gluers, ink jet printing and head cleaning, two magazine glueing machines, a cooling tower, non process space and water heaters, a bindery parts cleaner, chillers, a bucket cleaner used to clean plastic buckets, and a cold solvent cleaner used for cleaning parts of the presses for maintenance.

COMMENTS:

Emissions from the offset lithographic presses were calculated using the EPA document "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing." The presses are not subject to an individual regulation, however, VOC emissions from Press 442 have a synthetic minor limit to preclude non-attainment area review based on earlier determinations. This will stay in place on this permit. Emissions from the natural gas dryers were calculated using AP42, 1.4. All of the presses are controlled by condenser/filter control systems. The plant is subject to 401 KAR 50:012, General application. A Non-CTG RACT determination has been made for the entire plant requiring each press to have a VOC efficiency of 65% overall. The Division feels that the company is capable of meeting this requirement at this time with the existing controls and will require testing of all four control systems to demonstrate compliance.

The insignificant activities were certified by the company as being insignificant. The cold solvent cleaner is exempt from the standard of 401 KAR 59:185 under Section 8.

EMISSIONS AND OPERATING CAPS DESCRIPTION:

Publishers Printing Company is located in a non-attainment area for ozone. The source is subject to 401 KAR 50:012, General application, which requires RACT for VOC. The determination was made based on existing controls at the company, the draft CTG for offset lithographic presses, and other similar state regulations. RACT was determined to be 65% overall efficiency for each offset lithographic press.

Also, VOC emissions from Press 442 are required to be less than 40 tons/yr. This requirement is in place to preclude 401 KAR 51:052, Review of new sources in or impacting upon nonattainment areas. These requirements are in place to preclude non-attainment review and as a result of the type of construction permit the company requested.

The cold solvent cleaner is subject to 401 KAR 59:185, but is exempt from the standard under Section 8.

PERIODIC MONITORING:

All presses - Periodic monitoring will consist of measuring the inlet and outlet temperatures of the condenser/filter control system continuously. Also, the pressure drops will be measured continuously. Records will be kept for the condenser/filter control system of: a. the design and/or manufacturer's specifications; b. the operational procedures and preventative maintenance records; c. records of the temperature monitoring devices; d. records of the pressure drop monitoring devices; e. all periods during actual operation during which the temperature difference across the condenser/filter system (outlet temperature - inlet temperature) is zero or positive and corrective actions taken; f. all periods (during actual operation) during which the temperature difference across the condenser/filter control system (outlet temperature - inlet temperature) is less than 80% of the average temperature difference of the monitoring device as measured during the most recent performance test. g. all periods (during actual operation) during which the pressure drops across the condenser/filter control system are zero or positive and corrective actions taken; h. all periods (during actual operation) during which the pressure drops across the condenser/filter control system are less than 80% of the average pressure drops of the monitoring devices as measured during the most recent performance test; i. during all periods of startup, shutdown, or malfunction of the condenser/filter control system, a daily log of the following shall be kept - 1. whether any air emissions were visible from the facilities associated with the condenser/filter control system, 2. whether visible emissions were normal for the process, 3. The cause of the visible emissions, 4. any corrective action taken. Also, for Press 442, monthly records will be kept of the usage rates of all materials used at the press along with a calculation of total emissions of VOC for the current month and per 12 months. The emissions per 12 months shall be based on a 12 month rolling total.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.